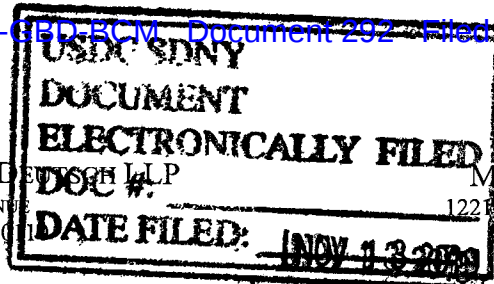


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November 12, 2019

The Honorable George B. Daniels
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 11A
New York, New York 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: NOV 13 2019

Commerzbank AG v. The Bank of New York Mellon, et al., No. 15-cv-10029

**Subject: Submission of Courtesy Copies
Following the Completion of Summary Judgment Briefing**

Dear Judge Daniels:

Pursuant to Rule III of Your Honor's Individual Rules of Practice, the parties jointly write regarding the submission of courtesy copies of the parties' summary judgment motion papers (ECF 268 and ECF 272). The Court previously ordered that the parties "provide the court a single set of summary judgment papers at the conclusion of briefing the motions, and permit the parties adequate time to generate the courtesy copies, which may require outsourcing the copying and binding of the material." (ECF 266).¹

While the parties have made significant efforts to streamline their submissions, the parties anticipate that the summary judgment courtesy copies will be voluminous. Accordingly, the parties jointly propose submitting courtesy copies of the summary judgment papers in the following manner subject to the Court's approval:

- **Format of the exhibits to declarations:** Given the volume of the parties' exhibits, the parties request permission to submit double-sided copies of the exhibits to the summary judgment declarations. The parties will submit all other papers single-sided pursuant to Your Honor's Individual Rule III (B).
- **Format of documents filed under seal:** In place of any documents filed in redacted form or under seal, the parties will provide courtesy copies of the unredacted versions of such documents. These documents will not bear ECF stamps. The parties will indicate for the Court which documents were filed under seal or in redacted form by submitting a colored slip sheet with each such document.
- **Delivery of courtesy copies:** The parties intend to deliver the courtesy copies in bankers boxes that are labeled to indicate the ECF Number(s) and the contents of each box.

¹ Under the current schedule (ECF 253), reply papers in support of summary judgment shall be filed no later than November 26, 2019.

- **Electronic courtesy copies:** Each party plans to submit electronic copies of its summary judgment papers in unredacted form on a disc or drive for the Court's convenience subject to the Court's approval.
- **Timing of submission of courtesy copies:** The parties request until December 10, 2019 to submit courtesy copies of their summary judgment filings to the Court in the manner set forth above.

The parties are available at the Court's convenience to discuss the above proposal for the submission of courtesy copies of the parties' summary judgment papers.

Respectfully submitted,

/s/ Ryan A. Kane

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Attorneys for Plaintiff

/s/ Allison J. Zolot

Allison J. Zolot
MAYER BROWN LLP
Attorneys for Defendants

cc: Counsel of Record